

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: DEALER MANAGEMENT  
SYSTEMS ANTITRUST LITIGATION**

**This Document Relates To:**

**THE DEALERSHIP CLASS ACTION**

MDL No. 2817

Case No. 18-cv-00864

Hon. Robert M. Dow, Jr.

Magistrate Judge Jeffrey T. Gilbert

**DEALERSHIP CLASS PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF  
INADEQUATELY LOGGED DOCUMENTS FROM DEFENDANTS' PRIVILEGE  
LOGS AND TO COMPEL DISCOVERY REGARDING DRAFTING OF AGREEMENTS**

Dealership Class Plaintiffs ("Dealership Plaintiffs") respectfully move this Court for entry of an order compelling: (1) production of certain documents reflected on Defendant CDK Global, LLC's ("CDK") and Defendant The Reynolds and Reynolds Company's ("Reynolds") (collectively "Defendants") privilege logs; and (2) discovery on Defendants' discussions with counsel related to the drafting of the Data Exchange Agreement, the 3PA Agreement, and the Reynolds Interface Agreement.

Pursuant to Local Rule 37.2, Dealership Plaintiffs certify that they have met and conferred with counsel for Defendants via telephonic conferences as well as via written communications in a good faith attempt to resolve the disputes presented by this motion.

DATED: March 1, 2019

Respectfully submitted,

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth (*pro hac vice*)

Elizabeth McKenna (*pro hac vice*)

**MILBERG TADLERPHILLIPS GROSSMAN LLP**

One Pennsylvania Plaza, 19th Floor

New York, NY 10119

Tel: (212) 594-5300

Fax: (212) 868-1229

[pwedgworth@milberg.com](mailto:pwedgworth@milberg.com)

[emckenna@milberg.com](mailto:emckenna@milberg.com)

***Interim Lead Counsel for the Dealership Class***

Leonard A. Bellavia (*pro hac vice*)

Steven Blatt

**BELLAVIA BLATT, PC**

200 Old Country Road, Suite 400

Mineola, New York 11501

Tel: (516) 873-3000

Fax: (516) 873-9032

[lbellavia@dealerlaw.com](mailto:lbellavia@dealerlaw.com)

[sblatt@dealerlaw.com](mailto:sblatt@dealerlaw.com)

***Dealership Class Plaintiffs' Steering Committee***

Daniel C. Hedlund (*pro hac vice*)

Michelle J. Looby (*pro hac vice*)

Daniel E. Gustafson

David A. Goodwin

Daniel J. Nordin

**GUSTAFSON GLUEK PLLC**

Canadian Pacific Plaza

120 South Sixth Street, Suite 2600

Minneapolis, MN 55402

Tel: (612) 333-8844

Fax: (612) 339-6622

[dhedlund@gustafsongluek.com](mailto:dhedlund@gustafsongluek.com)

[mlooby@gustafsongluek.com](mailto:mlooby@gustafsongluek.com)

[dgustafson@gustafsongluek.com](mailto:dgustafson@gustafsongluek.com)

[dgoodwin@gustafsongluek.com](mailto:dgoodwin@gustafsongluek.com)

[dnordin@gustafsongluek.com](mailto:dnordin@gustafsongluek.com)

***Dealership Class Plaintiffs' Steering Committee***

James E. Barz  
Frank Richter  
**ROBBINS GELLER RUDMAN & DOWD LLP**  
200 South Wacker Drive, 31<sup>st</sup> Floor  
Chicago, IL 60606  
Tel: (312) 674-4674  
Fax: (312) 674-4676  
jbarz@rgrdlaw.com  
frichter@rgrdlaw.com

David W. Mitchell (*pro hac vice*)  
Alexandra S. Bernay  
Carmen A. Medici  
**ROBBINS GELLER RUDMAN & DOWD LLP**  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Tel: (619) 231-1058  
Fax: (619) 231-7 423  
davidm@rgrdlaw.com  
xanb@rgrdlaw.com  
cmedici@rgrdlaw.com

***Dealership Class Plaintiffs' Steering Committee***

Robert A. Clifford  
Shannon M. McNulty  
**CLIFFORD LAW OFFICES, P.C .**  
120 N. LaSalle Street, 31 Floor  
Chicago, Illinois 60602  
Tel: (312) 899-9090  
Fax: (312) 251-1160  
RAC@cliffordlaw.com  
SNM@cliffordlaw.com

***MDL Liaison Counsel***

**CERTIFICATE OF SERVICE**

I, Peggy J. Wedgworth, an attorney, hereby certify that on March 1, 2019, I caused a true and correct copy of the foregoing **DEALERSHIP CLASS PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF INADEQUATELY LOGGED DOCUMENTS FROM DEFENDANTS' PRIVILEGE LOGS AND TO COMPEL DISCOVERY REGARDING DRAFTING OF AGREEMENTS** to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth